

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MARK FULTZ, Individually,)	CA No.: 2:21-cv-1863-BHH
)	
Plaintiff,)	
)	
-versus-)	DEFENDANT'S LOCAL
)	26.01 DISCLOSURES
BROTHERS PROPERTY MANAGEMENT)	
CORPORATION; PATRIOTS ANNEX,)	
LLC; PATRIOTS POINT DEVELOPMENT)	
AUTHORITY,)	
Defendant.)	
_____)	

- (A) **State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

RESPONSE:

None known at this time.

- (B) **As to each claim, state whether it should be tried jury or nonjury and why.**

RESPONSE:

The case should be tried nonjury as the Complaint seeks only equitable relief.

- (C) **State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

RESPONSE:

This Defendant is not a publicly owned company.

- (D) **State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

RESPONSE:

The facts and circumstances which give rise to this action arose in Charleston County which is within the Charleston Division.

- E) **Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason whole entail substantial duplication of labor if heard by different judges.**

RESPONSE:

No.

- (F) **If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

RESPONSE:

This Defendant is correctly identified.

- (G) **If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

RESPONSE:

None.

Dated this 18th day of June, 2021.

Respectfully submitted,

WALL TEMPLETON & HALDRUP, P.A.

s/Graham P. Powell

Graham P. Powell (Fed ID #7722)

Stephanie G. Brown (Fed ID #123434)

145 King Street

Post Office Box 1200

Charleston, South Carolina 29402

Telephone: (843) 329-9500

Graham.Powell@WallTempleton.com

Stephanie.Brown@WallTempleton.com

**Attorneys for Defendant Patriots Annex,
LLC**